



U.S. Department of Justice

United States Attorney
District of New Jersey

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May 26, 2010

VIA ELECTRONIC FILING

Honorable Stanley R. Chesler
United States District Judge
U.S. Post Office & Courthouse
1 Federal Square
Newark, New Jersey 07101

Re: United States v. Carlo St. Jean
Crim. No. 10-148(SRC)

Dear Judge Chesler:

Pre-trial motions are currently due on May 28, 2010; the government's response is due June 8, 2010; and a motions hearing has been set for June 22, 2010. The parties are currently still involved in plea negotiations and have consented to a continuance order which has been executed by the Court, tolling the Speedy Trial clock through July 16, 2010. Accordingly, the parties consent to the following proposed new motions schedule: pre-trial motions due June 21, 2010; the government's response due July 6, 2010; motions hearing date to be set by the Court.

Although defense counsel filed pretrial motions on May 24, 2010, that was done early with the understanding that the motions schedule would be moved back in accordance with the proposed dates above. Defense counsel has sought additional time to consult with his client and will also be unavailable for weeks due to upcoming eye surgery. Defense counsel will also be outside of the United States on June 22, 2010, the date currently set for the motions hearing.

The parties jointly request that the Court adopt the proposed motions schedule and will continue to apprise the Court of the result of any plea negotiations.

Thank you for your attention to this matter.

Respectfully submitted,

PAUL J. FISHMAN
United States Attorney

s/ Zahid N. Quraishi

By: ZAHID N. QURAISHI
Assistant U.S. Attorney

cc: E. Alexander Jardines, Esq.
(via electronic mail)

NO CHARGE

A handwritten signature in black ink, appearing to read 'Zahid N. Quraishi', is written over a faint, circular official stamp. The signature is fluid and cursive.